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bcc

Subject Corsicana Inc. exemption

Ben,

We've reviewed the application, ran some models and met with our division level management. At that level they are not opposed to approving exemptions for Class I. The model runs predicted the drift of the plume for 500 years after the last day of injection and reflect that the plume edge, which we defined as the point where the contaminant concentrations diluted to MCLs, adds about an additional thousand feet to the radius. So, we suggest an expanded radius.

In addition, we spoke to city officials who believe Corsicana will never use the Woodbine for a DW supply and were supportive of the exemption. Still EPA would expect TCEQ to go through the public participation phase.

As for approval, if TCEQ chooses to formally submit the application (with an expanded radius) it appears we would have the option of approving it as a non-substantial or simply not contesting it for 45 days, after which it is automatically approved. I don't know which method we would choose to use.

There is more I am sure to cover so if you want to set up a conference call give us the time and number and we will accommodate. I'm sure you'll let Fred Duffy know. I don't seem to have his email address.
Thanks

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